BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

RECEIVED

Jun 8 3 56 PM '01

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Complaint on Sunday	
and Holiday Collections	

Docket No. C2001-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO CARLSON INTERROGATORIES DFC/USPS-10 AND 12 (June 8, 2001)

DFC/USPS-1 - 18 were filed on May 21, 2001. The Postal Service requested and was granted an extension of time to file objections until June 8, 2001. P.O. Ruling No. C2001-1/2 (June 4, 2001). The Postal Service objects to questions 10 and 12 because both seek facility-specific volume information. It has long been the position of the Postal Service that facility-specific volume information is proprietary commercial information that should not be publicly disclosed. That is the basis for the Postal Service's objection to these two questions. The Postal Service, however, is seeking ways to provide useful and informative responses to these questions that do not disclose facility-specific volume information. We hope to have such a response to question 10 prepared by Tuesday, June 12, and expect that it will provide a satisfactory basis for year-to-year comparisons of mail processing on holidays. A response to question 12 will be filed on the 12th. The purpose of this pleading, therefore, is merely to preserve the objection in the event of future disagreement.

Therefore, to preserve its rights, the Postal Service files this partial objection to DFC/USPS-10 and 12 on the grounds stated above.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux Chief Counsel Ratemaking

Eric P. Koetting

Attorney

## **CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson P.O. Box 7868 Santa Cruz CA 95061-7868

David B. Popkin P.O. Box 528 Englewood NJ 07631-0528

Eric P. Koetting

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268-2992/ FAX: -5402 June 8, 2001